

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: ROBERT W. SMITH and : CHAPTER 13
RENEE D. SMITH :
Debtor(s) :
: CHARLES J. DEHART, III :
STANDING CHAPTER 13 TRUSTEE :
Movant :
vs. :
: ROBERT W. SMITH and :
RENEE D. SMITH :
Respondent(s) : CASE NO. 1-17-bk-02376

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 24th day of August, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:

- a. Plan ambiguous – payment

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 5th day of September, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael Caum, Esquire
P.O. Box 272
Shrewsbury, PA 17361

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee